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David Barrett, Ryan Schaffer, Blake
Bartlett, and Robert Lent*

[Additional counsel on signature page]

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

CODY WILHITE, individually, and on behalf
of all others similarly situated,

Plaintiff,

v.

EXPENSIFY, INC., DAVID BARRETT,
RYAN SCHAFFER, BLAKE BARTLETT,
and ROBERT LENT,

Defendants.

Case No.: 3:23-cv-01784-JR

**STIPULATION AND [PROPOSED] ORDER
EXTENDING DEADLINE TO FILE
OBJECTIONS TO FINDINGS AND
RECOMMENDATION REGARDING
DEFENDANTS' MOTION TO DISMISS**

(Civil L.R. 29)

Hon. Jolie A. Russo

Lead Plaintiff Aleem Kanji ("Lead Plaintiff") and Defendants Expensify, Inc.

(“Expensify”), David Barrett, Ryan Schaffer, Blake Bartlett, and Robert Lent (collectively, with Expensify, the “Expensify Defendants”), J.P. Morgan Securities LLC, Citigroup Global Markets Inc., BofA Securities, Inc., Piper Sandler & Co., Citizens JMP Securities, LLC, and Loop Capital Markets LLC (collectively, the “Underwriter Defendants,” and together with Lead Plaintiff and the Expensify Defendants, the “Parties”) by and through their undersigned counsel, hereby stipulate and agree as follows and jointly request that the Court enter the below Order approving this Stipulation.

WHEREAS, on July 9, 2024, the Expensify Defendants filed their Motion to Dismiss the Amended Class Action Complaint, Dkt. No. 53, and Request for Judicial Notice In Support of Their Motion to Dismiss, Dkt. No. 55;

WHEREAS, on July 9, 2024, the Underwriter Defendants filed a Notice of Joinder in Expensify Defendants’ Motion to Dismiss the Amended Class Action Complaint, Dkt. No. 57;

WHEREAS, on December 30, 2024, Magistrate Judge Russo issued her Findings and Recommendation as to the Expensify Defendants’ Motion to Dismiss the Amended Class Action Complaint and Request for Judicial Notice, Dkt. No. 62 (the “F&R”);

WHEREAS, on December 30, 2024, Magistrate Judge Russo referred the F&R to Judge Amy M. Baggio for review and ordered the Parties to file written objections to the F&R within fourteen (14) days from the date of service of a copy of the F&R, Dkt. No. 63;

WHEREAS, the Parties have met and conferred and agree that due to previously planned travel and family commitments over the holidays and to ensure that the Parties have sufficient time to adequately address the complex, important, and nuanced issues raised in Magistrate Judge Russo’s F&R, an extension of the deadline to file written objections to the F&R should be extended by eight (8) days to January 21, 2025;

WHEREAS, counsel for the Parties respectfully submit that good cause exists to enter the below schedule for the Parties’ objections to Magistrate Judge Russo’s F&R.

IT IS ACCORDINGLY STIPULATED, by and between the undersigned counsel for the Parties, that subject to the Court’s approval:

1. The Parties shall file any written objections to the F&R (Dkt. No. 62) by no later than January 21, 2025.

2. The Parties shall file any responses to the objections by no later than February 4, 2025.

DATED: January 2, 2025

Respectfully submitted,

FOSTER GARVEY PC

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Lead Counsel for Lead Plaintiff

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: _____

Hon. Jolie A. Russo
United States Magistrate Judge

SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Stipulation and [Proposed] Order Extending Deadline to File Objections to Findings and Recommendation Regarding Defendants' Motion to Dismiss. Pursuant to L.R 11-1(b) regarding signatures, I, Eryn Karpinski Hoerster, attest that concurrence in the filing of this document has been obtained.

DATED: January 2, 2025

/s/ Eryn Karpinski Hoerster
Eryn Karpinski Hoerster